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February 2, 2005

VIA ECFS

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington DC 20554

Re: Ex Parte Presentation in CC Docket No. 01-92

Dear Ms. Dortch:

On Monday, January 31, 2005, Jim Lamoureux, Eric Einhorn, and Gary Phillips of SBC met with Jeffrey Dygert, Russ Hanser, Chris Killion, and Jeremy Marcus of the Commission Staff to discuss intercarrier compensation issues raised in the above-captioned proceedings. At the meeting, we reiterated our position that the Commission should issue an FNPRM as soon as possible to further its efforts on broader intercarrier compensation reform, and we requested that the Commission refrain from dealing with individual intercarrier compensation issues in piecemeal fashion. We also addressed the issue of "virtual NXX" traffic. Consistent with the points in the attached material, we highlighted the legal indefensibility of any Commission order holding that interexchange calls facilitated by VNXX arrangements are subject to either reciprocal compensation or the Commission's ISP compensation mechanism.

If you have any questions, please do not hesitate to contact me at (202) 326-8895.

Sincerely,

/s/ Jim Lamoureux
Senior Counsel
SBC Services, Inc.

Cc: Jeffrey Dygert
Russ Hanser
Chris Killion
Jeremy Marcus